

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA**

CHARLESTON DIVISION

IN RE: ETHICON INC., PELVIC
REPAIR SYSTEM PRODUCTS
LIABILITY LITIGATION

MDL NO. 2327

THIS DOCUMENT RELATES TO:

ETHICON WAVE 1 CASES

**PLAINTIFFS' MOTION TO EXCEED PAGE LIMITATION FOR MEMORANDUM IN
OPPOSITION TO DEFENDANTS' MOTION TO EXCLUDE THE OPINIONS AND
TESTIMONY OF JERRY BLAIVAS, M.D.**

Plaintiffs respectfully request that the Court grant them leave to exceed the 20-page limitation set forth in Local Rule 7.1(a)(2), as it relates to their Memorandum in Opposition to Defendants' Motion to Exclude the Opinions and Testimony of Jerry Blaivas, M.D. As support for this motion, Plaintiffs cite to Defendants own Motion to Exceed Page Limitation (Dkt. 1965), in which Defendants contend that they intend to challenge "many aspects of Dr. Blaivas' opinions." This Court granted Defendants' Motion (Dkt. 1966) and Defendants' Motion is thirty (30) pages in length and includes over one thousand five hundred fifty eight (1,558) pages of exhibits. Defendants' assertions are many, including challenges to testimony relating to Dr. Blaivas' most recent peer review, published literature and articles, which are themselves lengthy and the result of years of research and review.

Plaintiffs request that they be granted leave to exceed the twenty-page limitation in order to adequately address Defendants' numerous assertions regarding Dr. Blaivas, his scientific research, and testimony. For all of these reasons, Plaintiffs submit that they have presented good cause for relief from the page limitation.

This 3rd day of May, 2016.

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CERTIFICATE OF SERVICE

I hereby certify that on May 3, 2016, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL.

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